

It demonstrates a technical misunderstanding of VoIP for the FCC to require that VoIP providers geolocate their subscribers. I am a Massachusetts resident but am currently in New Zealand for the month of August. I subscribe to three different VoIP systems: Skype, Vonage, and an Asterisk-based system using a softphone on my Mac. I can use any of these systems to call my "local" police department in Belmont. With two of them, Vonage and the softphone, I can dial "911" and have it automatically patched through.

Here's the problem: I can be doing this with New Zealand-based IP addresses or with my VPN IP addresses. There's really no way to know which IP addresses are being used unless you require some kind of back-door in all of the VoIP and VPN systems to provide for strong accountability and tracability. Such a proposal would have very negative privacy implications, would likely be misused, would be expensive, and would represent a security risk.

911 is a nice idea. However, rather than trying to shoehorn IP-based systems into a POTS approach, it would be better to encourage the development of IP solutions such as anycast, which can perform this kind of function.